



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Filed by ECF

No. 13-cv-7074 (GBD)

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FIONA HAVLISH, individually and
on behalf of the ESTATE OF
DONALD G. HAVLISH, JR.,
Deceased, et al.,

Petitioners,

v.

ROYAL DUTCH SHELL PLC
Carel van Bylandtlaan 30
2596 HR The Hague
The Netherlands

Respondents.
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Judgment Debtors:
Islamic Republic of Iran
National Iranian Oil Company
Islamic Revolutionary Guard Corp
Ministry of Petroleum
Ayatollah Ali Hosenei Khameneri
Ali Akbar Hashemi Rafsanjani
Ministry of Information and Security
National Iranian Tanker Corporation
National Iranian Gas Company
National Iranian Petrochemical Co.
Ministry of Econ. Affairs & Finance
Ministry of Commerce
Ministry of Defense & Armed Forces
Iran Airlines
Central Bank of Iran
Hezbollah

STIPULATION AND CONSENT ORDER

This Stipulation and Consent Order in the above-captioned action is entered into this 7th day of November 2013, by and among Fiona Havlish, individually and on behalf of the Estate of Donald G. Havlish, Jr., Deceased, et al. (collectively, the "Havlish Judgment Creditors" or the "Petitioners"), and respondent Royal Dutch Shell plc ("RDS" or "Respondent"), which appears specially for purposes of this Stipulation, without prejudice to its right to contest service and jurisdiction in this matter.

WHEREAS, Petitioners purport to hold an unsatisfied judgment in the amount of \$6,048,513,805, plus interest against the Islamic Republic of Iran and fifteen of its political subdivisions, agencies and instrumentalities (collectively, the "Iranian Judgment Debtors");

WHEREAS, on October 4, 2013, Petitioners filed in this Court a Petition seeking to garnish approximately \$2,336,000,000 in funds allegedly allegedly held by RDS as a payable to the National Iranian Oil Company, one of the Iranian Judgment Debtors (the "Petition");

WHEREAS, on October 7, 2013, this Court issued an Order scheduling an initial pretrial conference in this action for Wednesday, December 18, 2013, at 9:30 a.m.;

WHEREAS, Petitioners and Respondent have agreed that the time for Respondent to answer, move or otherwise respond to the Petition should be extended until January 6, 2014 (without prejudice to Respondent's right to contest service and jurisdiction);

WHEREAS, Respondent's counsel will be out of the country on business during the week of December 16, 2013 and cannot attend the status conference as currently scheduled;

WHEREAS, Petitioner does not object to rescheduling that status conference to a time convenient for the Court and the parties:

IT IS THEREFORE AND HEREBY AGREED AND ORDERED THAT:

1. Respondent will file an answer or move to dismiss the Petition on or before January 6, 2014. If Respondent elects to move to dismiss the Petition, Petitioners' opposition to any motion to dismiss will be due on or before February 3, 2014, and Respondent's reply will be due on or before February 17, 2014.

2. The initial pre-trial conference in this matter originally scheduled for December 18, 2013 at 3:00 p.m. is adjourned and rescheduled for January 22, 2014 at

9:30am

3. Nothing in this Stipulation and Consent Order will be deemed a waiver of Respondent's objections as to service, jurisdiction or venue.

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SO ORDERED:

George B. Daniels NOV 19 2013
Hon. George B. Daniels, USDJ
November __, 2014